

[Submitting Counsel below]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:

ALL CASES

ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIAL SHOULD BE SEALED

TO THE COURT, THE PARTIES, AND ALL COUNSEL OF RECORD:

Under Civil Local Rules 7-11 and 79-5(f), Plaintiffs move the Court to consider whether certain material should be sealed. The material is discussed in Plaintiff's Brief In Support of Proposed Defendant Fact Sheet.

Material to Be Filed Under Seal

Although the Parties do not yet have a protective order, they have agreed to maintain confidentiality of sensitive documents. Plaintiff's Brief In Support of Proposed Defendant Fact Sheet includes information regarding Uber's data systems, some or all of which may be confidential. Thus, Plaintiffs request the Court consider whether the following documents should be filed under seal:

Document	Description	Designating Party
Plaintiffs' Brief in Support of Proposed Defendant Fact Sheet	References to Uber's data systems.	Uber

1 Under Local Rule 79-5(f)(3), the Designating Party bears responsibility to establish
 2 that all of the designated material is sealable, and must “file a statement and/or declaration as
 3 described in subsection (c)(1)” of the Local Rules. None of the information at issue was
 4 marked confidential by Plaintiffs. Plaintiffs take no position at this time on whether the
 5 designated material satisfies the requirements for sealing, and reserve the right to challenge
 6 the sealability of these documents under Civil Local Rule 79-5.

7 This motion complies with Civil Local Rule 7-11 and 79-5, and the following
 8 attachments accompany this motion:

9 1. The Declaration of Sarah R. London in Support of this Motion; and
 10 2. A Proposed Order that lists in tabular format all material sought to be sealed.

12 Dated: January 31, 2024

Respectfully submitted,

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